

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ABBIE GARCIA, BRANDON PONTIOUS,	)	
and ORIN HUGHES, Individually and	)	
On Behalf of All Others	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION: 5:14-cv-0985-DAE-CM
	)	
	)	
TWC ADMINISTRATION LLC d/b/a	)	
TIME WARNER CABLE,	)	
	)	
Defendant.	)	

**NOTICE OF COLLECTIVE ACTION**  
**IN FEDERAL OVERTIME LAWSUIT AGAINST TIME WARNER CABLE**

**TO:** All current and former Inbound Sales Agents who worked for TWC Administration LLC (“Time Warner Cable”) at its San Antonio, Texas call center at any time between April 16, 2012 to the present.

**RE:** Fair Labor Standards Act (“FLSA”) overtime and minimum wage lawsuit against Time Warner Cable.

**1. Introduction.**

You are receiving this notice because you may be eligible to join a collective action lawsuit involving federal overtime wage laws entitled Garcia et al v. TWC Administration LLC, 5:14-cv-985-DAE-CM (the “Lawsuit”). The Lawsuit was filed in the United States District Court for the Western District of Texas, San Antonio Division.

The plaintiffs in the Lawsuit allege, among other things, that Time Warner Cable failed to pay them for all hours worked. Time Warner Cable disagrees and asserts that it properly paid all Inbound Sales Agents for all hours worked. The Court has not yet expressed any opinion about the merits of the claims asserted, the defenses raised, or the final outcome of the case.

**2. Your Right to Participate in The Lawsuit.**

If you worked for Time Warner Cable as an Inbound Sales Agent at its San Antonio, Texas call center between April 16, 2012 and the present and wish to join the Lawsuit, you may, but are not required to, join (that is, you may “opt-in” to the Lawsuit) by completing and mailing the attached “Notice of Consent to Join Collective Action” form to Plaintiffs’ Counsel at:

Martin A. Shellist  
Ricardo J. Prieto  
Dorian Vandenberg-Rodes  
Shellist Lazarz Slobin LLP  
11 Greenway Plaza, Suite 1515  
Houston, Texas 77046  
Phone: 713-621-2277

**IF YOU WISH TO JOIN THE LAWSUIT, YOU MUST SIGN, DATE AND MAIL THE “NOTICE OF CONSENT” FORM TO PLAINTIFFS’ COUNSEL IN TIME FOR COUNSEL TO FILE YOUR “NOTICE OF CONSENT” FORM WITH THE COURT ON OR BEFORE [INSERT DATE 60 DAYS AFTER NOTICE IS MAILED]. IF THE FORM IS NOT FILED WITH THE COURT BY THIS DEADLINE, YOU MAY BE PREVENTED FROM JOINING THIS LAWSUIT.**

**3. Effect of Joining This Lawsuit.**

If you choose to join this Lawsuit, you will be bound by the judgment or settlement, whether it is favorable or unfavorable, and will give up the right to file your own lawsuit in a separate action for the claims asserted in this case. Further, you designate the collective action representatives as your agents to make binding decisions on your behalf concerning the litigation.

If you choose to join this Lawsuit and agree to be represented by the named Plaintiffs, Abbie Garcia, Brandon Pontious, and Orin Hughes, through their attorneys, your counsel in this case will be Shellist Lazarz Slobin LLP. Alternatively, you may join this Lawsuit and retain counsel of your own choosing at your own expense.

If you choose to join the Lawsuit, you may be required to respond to written questions and requests for documents from Time Warner Cable and/or travel to San Antonio to give your deposition, attend hearings, or attend trial.

If you choose to join the Lawsuit and the plaintiffs prevail on their claims, you may recover unpaid wages from Time Warner Cable. If the plaintiffs lose, you may be required to pay a portion of Time Warner Cable’s costs of litigation.

**4. If You Choose Not to Join This Lawsuit.**

You are not required to join the Lawsuit. If you choose not to join this Lawsuit, you will not be affected by any judgment rendered or settlement reached in this case. If you choose not to join this lawsuit, then do not complete and mail the “Notice of Consent to Join Collective Action” form.

**5. No Retaliation Permitted.**

Federal law prohibits anyone, including Time Warner Cable, from discriminating or retaliating against you for joining or not joining this lawsuit.

**6. Further Information.**

If you have questions about this Notice, or about the Lawsuit, you may contact Plaintiffs' counsel, Shellist Lazarz Slobin LLP, at the number and address listed above.

**THIS IS A COURT APPROVED NOTICE BY THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION, THE HONORABLE JUDGE DAVID A. EZRA. THE COURT HAS NOT EXPRESSED ANY OPINION ON THE MERITS OF THE CLAIMS OR DEFENSES IN THIS CASE AND YOU SHOULD NOT INTERPRET THIS NOTICE AS AN EXPRESSION OF SUCH AN OPINION. PLEASE DO NOT CONTACT THE COURT OR THE CLERK WITH QUESTIONS ABOUT THE LAWSUIT OR THE NOTICE.**